

EXHIBIT 2

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August 20, 2021

Spiegel & Utrera, P.A., P.C.
1 Maiden Lane, 5th Floor
New York, NY 10038

Re: LEONID TREYGER v. FIRST CLASS FURNITURE AND RUGS INC., 108 CORONA REALTY CORP., JOHN DOE 1-X, persons yet unknown, Limited Liability Companies, Partnerships, Corporations 1-X, entities yet unknown
Case No.: 21-cv-2902-EK-RLM

By US Mail. USPS Tracking Number: 9449328206334347556285

Attention: Chief Executive Officer of First Class Furniture and Rugs Inc.

Dear Sir or Madam:

Please be advised that my law firm filed the above-captioned legal action on behalf of my client, Leonid Treyger, in the federal court for the Eastern District of New York on May 24, 2021. The lawsuit stems from the discrimination of my client by the defendants on the basis of disability in violation of the Americans with Disabilities Act (the “ADA”), 42 U.S.C. §12182, §12183 and §12188(a), NYS Civil Rights Law §40-c and §40-d, NYS Human Rights Law §296 and New York City Human Rights Laws [Administrative Code] §8-107.

Under the Federal Rules of Civil Procedure, Rule 12(a), you were required to plead, or otherwise respond, to the complaint, by June 28, 2021. That date includes the three-day extension of time, to which you are entitled. You failed to plead, or otherwise respond, to the complaint. Consequently, on August 9, 2021, I filed an application for a certificate of default with the Clerk for the United States District Court for the Eastern District of New York. On August 18, 2021, I filed a motion for default judgment. The Court denied it, without prejudice, because it was improperly filed. I filed it again today.

Enclosed please find a copy of the motion for default judgment with exhibits, as well as courtesy copies of the summons and complaint, which have been served on the New York Secretary of State. Notice of this litigation, together with a copy of the complaint, was sent to the New York City Commission on Human Rights and the New York State Civil Rights Bureau. Enclosed are also copies of the affidavit of service, application to clerk for a certificate of default and certificate of default issued by the clerk of court.

LEONID TREYGER v. FIRST CLASS FURNITURE AND RUGS INC., 108 CORONA REALTY CORP., JOHN DOE 1-X, persons yet unknown, Limited Liability Companies, Partnerships, Corporations 1-X, entities yet unknown

Attn.: Chief Executive Officer of First Class Furniture and Rugs Inc.

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My client's ultimate goal is that the defendants remediate their violations of the ADA, bring their property in full compliance with the ADA, as well as the other aforementioned laws, and compensate my client for his attorney's fees, expenses and costs. My client wants to avoid a prolonged costly litigation, seeking statutory and compensatory damages, obtaining injunctive, and declaratory reliefs, and looks forward to reaching a quick and amicable resolution of this matter.

Please contact me should you have any questions, concerns, or to discuss settlement of this matter.

Very truly yours,


Michael Grinblat, Esq.
Enclosures



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January 1, 2022

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